

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
NORTHWESTERN DIVISION

UNITED STATES OF AMERICA	)	<u>S U P E R S E D I N G</u>
	)	<u>I N D I C T M E N T</u>
	)	
v.	)	Case No. 4:13-cr-00010
	)	
TIFFANY SHANICE ANDERSON	)	Violation: 18 U.S.C. §§ 844(e), 875(c), 2261A(2) and 2

COUNT ONE

**Communicating a Threat to Destroy Property by Explosive**

The Grand Jury Charges:

On or about November 6, 2012, in the District of North Dakota, and elsewhere,

TIFFANY SHANICE ANDERSON,

through the use of the telephone and other instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to unlawfully damage and destroy any building, vehicle, and real and personal property by means of an explosive on the Minot Air Force Base, North Dakota;

In violation of Title 18, United States Code, Sections 844(e) and 2.

COUNT TWO

**Communicating a Threat to Destroy Property by Explosive**

The Grand Jury Further Charges:

On or about December 18, 2012, in the District of North Dakota, and elsewhere,

TIFFANY SHANICE ANDERSON,

through the use of the telephone and other instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to unlawfully damage and destroy any building, vehicle, and real and personal property by means of an explosive on the Minot Air Force Base, North Dakota;

In violation of Title 18, United States Code, Sections 844(e) and 2.

COUNT THREE

**Communicating a Threat to Destroy Property by Explosive**

The Grand Jury Further Charges:

On or about December 19, 2012, in the District of North Dakota, and elsewhere,

TIFFANY SHANICE ANDERSON,

through the use of the telephone and other instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to unlawfully damage and destroy any building, vehicle, and real and personal property by means of an explosive on the Minot Air Force Base, North Dakota;

In violation of Title 18, United States Code, Sections 844(e) and 2.

COUNT FOUR

**Interstate Threatening Communications**

The Grand Jury Further Charges:

On or about December 20, 2012, in the District of North Dakota, and elsewhere,

TIFFANY SHANICE ANDERSON

transmitted in interstate commerce a communication containing a threat to injure the person of another; specifically, TIFFANY SHANICE ANDERSON threatened to shoot children at the Minot Public Schools Head Start program located on the Minot Air Force Base;

In violation of Title 18, United States Code, Sections 875(c) and 2.

COUNT FIVE

**Stalking**

The Grand Jury Further Charges:

From in or about October 2012 and continuing until in or about December 2012,  
in the District of North Dakota, and elsewhere,

TIFFANY SHANICE ANDERSON,

with intent to -

(a) kill, injure, harass, and place under surveillance with intent to kill, injure, harass, and intimidate, and cause substantial emotional distress to Kevin Buchanan, a person located in another State and within the special maritime and territorial jurisdiction of the United States; and,

(b) to place Kevin Buchanan, a person located in another State and within the special maritime and territorial jurisdiction of the United States, in reasonable fear of the death of, and serious bodily injury to, himself and a member of his immediate family; used any interactive computer service and any facility of interstate and foreign commerce to engage in a course of conduct that caused substantial emotional distress to Kevin

Buchanan and placed Kevin Buchanan in reasonable fear of the death of, and serious bodily injury to, himself and a member of his immediately family;

In violation of Title 18, United States Code, Section 2261A(2) and 2.

A TRUE BILL:

/s/ Grand Jury Foreperson

Foreperson

/s/ Timothy Q. Purdon

TIMOTHY Q. PURDON

United States Attorney

RLV:rab